

November 13, 1974

Mr. N. John McNeill, President and
Chief Executive Officer
Great Lakes Gas Transmission Company
11th Floor
One Woodward Avenue
Detroit, MI 48226

Dear Mr. McNeill:

Pursuant to our meeting with you and your staff on September 30, 1974, we have reviewed the information regarding a possible waiver of §192.611(a) for mileposts (MPs) 88.7, 691.9, 709.9, and 795.8. In these four instances, you advised us that your pipeline is in a Class 3 location since it is closer than 300 feet to a building occupied by 20 or more persons during normal use (a church in each case). You provided us with the enclosed table providing minimum distances to the building, estimated normal pressure, maximum allowable opening pressure (MAOP) of 812 psi pursuant to §192.611(a), and other pertinent information. You indicated that in all instances, each particular building occupied slightly more than 20 persons during normal use so that you felt that a waiver might be justified in all four cases. The operating pressure at all four MPs must be confirmed or revised by the end of this year pursuant to §192.611(e).

After a review of this information, we have concluded that at MPs 691.9, 709.9, and 795.8, your normal operating pressures of 760 psi, 700 psi, and 725 psi, respectively, are all within the MAOP of 812 psi. Therefore, you do not need a waiver of §192.611(a) in these three instances. However, proper precautions must be taken to prevent the pressure at these locations from exceeding the established MAOP under any conditions, since such a situation would not comply with §192.611(a).

Regarding MP 88.7, the normal pressure at this point should likewise not exceed the MAOP of 812 psi. It appears, therefore, that the normal operating pressure of 875 psi is in excess of the MAOP and therefore this normal operating pressure must be limited to a maximum of 812 psi. However, since the minimum distance to the building is 280 feet and it approaches the 300-foot limit prescribed under §192.5 for a Class 3 location, it appears that there may be substantiation for a possible waiver from §192.611(e) for a limited period of time. If granted, this waiver could possibly allow you time to perform the necessary adjustments to your system or its environment.

We would therefore be disposed to consider such a waiver for MP 88.7 for a limited period with proper substantiation for such a waiver, which should include why the public interest would be

served by the waiver and the basis upon which the waiver would not be inconsistent with gas pipeline safety.

If we can assist you further regarding your possible request for a waiver, please advise us.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety

Enclosure